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Michael J. Lynch, Treasurer Illinois Tool Works for Better Government Committee 3600 W. Lake Avenue Glenview, IL 60025

OCT 4:9 2002

Identification Number:

C00000042

Reference:

Year End Report (7/1/01-12/31/01)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your 2001 Mid-Year Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Your report includes a Schedule H1 with section A (Fixed Federal Percentage for National Party Committees) checked. However, separate segregated funds that allocate should use section C (Funds Expended for Separate Segregated Funds and Non-Connected Committees). A political committee that has established a federal account and a non-federal account must allocate between its federal and non-federal account all expenses for administrative costs, generic voter drives and fundraising programs or events. 11 CFR §106.6(b)(2)

Separate Segregated Funds and Nonconnected committees must report the estimated percentages of their direct federal and non-federal candidate support for a two-year election cycle by filing a Schedule III. To calculate the allocation ratio for administrative and generic voter drive costs, nonconnected committees use the funds expended method. 11 CFR §106.6(c)(1)

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Party committees must allocate any administrative expenses between the federal and non-federal accounts in proportion to the ballot composition method derived from FEC Schedule H1. 11 CFR §106.5

Schedule H2 is used by all political committees to report the allocation ratios of their joint federal and non-federal fundraising events and direct candidate support programs. Schedule H2 is filed with each report that discloses a disbursement for a shared activity. Schedule H3 is used by all political committees to report transfers received by the federal account from the non-federal account(s) to pay the non-federal share of allocable expenses.

Any expenditures made on behalf of both federal and non-federal candidates (including in-kind contributions, independent expenditures and coordinated expenditures) must also be allocated between your committee's federal and non-federal accounts. Schedule H4 is used by all political committees to report payments for allocable expenses. 11 CFR §§106.1(a) and 106.5

Please clarify the procedures you are currently using to allocate shared activity. The Commission recommends that you take steps to correct any non-compliance with the regulations. Also, your committee should establish procedures to ensure future compliance with the allocation regulations.

-Schedule B supporting Line 23 discloses a voided check(s) to Jennifer Carroll, however, it appears that the original contribution(s) has not been reported by your committee. Please amend the report covering the period(s) during which the contribution(s) was disbursed and disclose the original date of the contribution.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at

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the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Maureen Benitz

Campaign Finance Analyst Reports Analysis Division

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